

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)	Judge Campbell
GUIDEPOST SOLUTIONS LLC; and)	Magistrate Judge Frensley
EXECUTIVE COMMITTEE OF THE)	Jury Demand
SOUTHERN BAPTIST CONVENTION,)	
)	
Defendants.)	

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Rules 5.03 and 7.01 of the Local Rules of Court and the Second Amended Agreed Protective Order previously entered in this action (ECF Doc. No. 153), Plaintiff Johnny M. Hunt respectfully submits this Motion for Leave to File Under Seal the unredacted version of the Memorandum in Support of Motion to Compel Forensic Collection, as well as certain exhibits thereto, submitted by Plaintiff on May 31, 2024 (ECF Doc. No. 204) until such time as the Court adjudicates the issues.

Portions of the Memorandum in Support of Motion to Compel Forensic Collection contain references to information that has been designated as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Second Amended Agreed Protective Order, which has also resulted in the public filing of the Memorandum in Support of Motion to Compel Forensic Collection in redacted form pursuant to Local Rule 5.03(c).

Without conceding the propriety or the merits of the “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” designations, Plaintiff files the instant motion in an effort

to ensure compliance with the Local Rules of the Court and the Second Amended Agreed Protective Order.

For the foregoing reasons, and without conceding the merits of the “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” designations, this Court should review the unredacted version of the Memorandum in Support of Motion to Compel Forensic Collection and exhibits under seal.

[SIGNATURE BLOCKS AND CERTIFICATE OF SERVICE TO FOLLOW]

Dated: May 31, 2024

Respectfully submitted,

s/ Andrew Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Motion for Leave to File Under Seal to be electronically filed with the Clerk of the Court on May 31, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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